

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.: 1:16 CR 320-4
)
Plaintiff,) JUDGE DONALD C. NUGENT
)
v.)
)
REAUNA PASS,) <u>GOVERNMENT'S MOTION FOR LEAVE</u>
) <u>TO DISMISS INDICTMENT</u>
Defendant.)

Now comes the United States of America, through its counsel, Justin E. Herdman, United States Attorney, and Om M. Kakani, Assistant United States Attorney, and respectfully moves this Court for an order to dismiss this matter. Defendant Pass has successfully completed a pre-trial diversion program administered by this Court [R. 225: Order, PageID 1539] and the government now seeks leave pursuant to Fed. R. Crim. P. 48(a) to dismiss the charges in this case against her. A copy of the proposed Order of Dismissal is attached hereto.

Respectfully submitted,

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United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of June 2019, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Om Kakani

Om Kakani

Assistant U.S. Attorney